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The Boeing Company

P.O. Box 516

St. Louis, MO 63166-0516

(314) 232-0232 TELEX 44-857

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The Boeing Employees' Amateur Radio Society-St. Louis

May 13, 1998

Office of the Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, DC 20554

Dear Sir or Madam:

SUBJECT: RM-9267.

We the undersigned would like to file the following comments with the Federal Communications Commission (FCC) regarding the subject rulemaking petition filed by the Land Mobile Communications Council (LMCC).

The reallocation of the 420-430/440-450 MHz (70-cm) band segments from the federal government to the Private Mobile Radio Service (PMRS) would adversely affect our ability to provide needed public service to our community. Our club regularly participates in public service activities in areas where interference from the PMRS would be much greater than that of the federal government. This interference could greatly compromise the safety of the participants of activities for which these band segments are used to provide communication services.

The 70-cm band is the second most popular of the Amateur Radio Service's VHF/UHF allocations, with substantial FM repeater and other operation in the 440 to 450 MHz segment and a variety of uses in the 420 to 430 MHz segment. As such, our membership has invested considerable personal funds to build an inventory of equipment suitable for these public service activities. Replacement or procurement of equipment capable of operating on alternate amateur band segments would place an undo monetary hardship on our membership.

Sincerely,

Members of the Boeing Employees' Amateur Radio Society-St. Louis

Enclosure (1): Signature List

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List A B C D E

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RM9267  
Secretary  
Federal Communications Commission  
1919 "M" Street, N.W.  
Washington, DC 20554

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Before the Federal Communications Commission )  
In re: Petition RM-9267 (Land Mobile Communications Council) )  
Filed: April 30, 1998 )

---

Comes now David B. Ritchie with the following comments pertinent to the above-referenced petition:

I am writing to oppose the above-referenced petition in so far as it seeks a reallocation of the frequencies 420 to 450 MHz currently allocated on a secondary basis to the Amateur Radio Service. This reallocation is sought, I understand, at pages 28 through 31 of the above-referenced petition. I oppose the petition for the following reasons:

1. I am a frequent user of the 420 - 450 MHz amateur radio band;
2. I have used it and/or plan to use it for the following purposes:
  - (a) emergency communications;
  - (b) satellite communications;
  - (c) repeater communications;
  - (d) weak signal and contest communications;
  - (e) moon bounce communications (planned).
3. I have used the following modes on the 420-450 MHz band: CW, FM, SSB.
4. I participate in emergency communications systems such as the W6UE-Caltech

Amateur Radio Club, Emergency Communications Repeater located in Pasadena, California, and operated in conjunction with the California Institute of Technology which relies heavily on the availability of the 420-450 MHz band for amateur radio purposes. This repeater serves a critical emergency preparedness function at the California Institute of Technology which cannot be easily replaced. The Caltech Amateur Radio Club has made an investment of over \$12,000 in

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establishing this emergency communications repeater on the 420-450 MHz band. The equipment cannot simply be transferred to some other band and would be a total loss if the 420-450 MHz band was made unavailable for amateur radio purposes. I do not believe that the money is available to reconstitute a similar emergency communications capability on another band should the 420-450 MHz band be reallocated away from amateur radio purposes.

5. I have used similar repeater systems on the 420-450 MHz band throughout the United States since 1980 and believe that virtually all of these systems will be adversely impacted by the proposed action. The proposed action appears likely to effectively deny the 420-450 MHz band to the Amateur Radio Service withdrawing millions of dollars of needed emergency communications capability from the people of the United States.

6. I have personally made a significant monetary investment in the 420-450 MHz amateur radio band. The total amount of money that I have invested in equipment useable on this band is in excess of \$2,000.

7. If the 420-450 MHz band is taken away from the amateur radio service, I do not presently believe that I will make a similar investment in another band, and this capability, mostly available for emergency communications, will be lost.

8. If the 420-450 MHz amateur radio band is effectively taken away through the proposed action, I believe that my emergency service activities to the community will be significantly curtailed.

9. I am licensed as N7UE, am an extra class licensee of the Federal Communications Commission in good standing, and have been a Commission licensee since 1980.

The above statements are true and correct to the best of my knowledge.

Executed by David B. Ritchie, N7UE, on May 19, 1998 at San Jose, California.



---

David B. Ritchie, N7UE  
1731 Technology Drive, Suite 700  
San Jose, CA 95110

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May 27, 1998

The Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Dear Sir:

This is to comment on RM-9267

This petition for rulemaking has serious flaws, some of which I wish to point out.

First, I am a twelve year retiree from Westinghouse after 34 years as an Electrical Engineer. I have been an Amateur Radio Licensee for 45 years and have no monetary interest in any aspect of this situation, other than owning some Ham equipment for the 420 band (\$350).

While the LMCC is trying for many frequency bands I will talk about the impact on Ham radio.

In paragraph 7 business needs are mentioned, but carefully left out are the needs of charitable and non-profit organizations that depend on Ham radio for help. They use some of the frequencies that LMCC is trying to get. In other words, the LMCC is trying to disrupt some of the public service that Hams provide.

In paragraph 34 it is claimed that we have already given up the band 420-430 Mhz in 3 northern cities. Hams lost these frequencies away from their Hams and asked the U.S.A. to eliminate the use by U.S. Hams of this band near the border. Canada with less population than California dictated policy to a large segment of U.S. Hams.

In paragraph 69 it states that the use of 420-430 Mhz has not interfered with systems in the U.S. or Canada. Of course not, there are none in the U.S. but Hams have had some problems here. In Canada there are no Hams to interfere with.

There are many other half-truths and distortions in the proposal, but I am sure others will point them out, so I will make some final comments and close.

The claim that we can share the bands with them as a benevolent primary user is preposterous, the Hams have proved that two users of the same frequency in the same area does not work. If the LMCC is so sure that we can share, let them be secondary to the Hams.

*\* because Canada took these frequencies \**

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Page -2-

5/27/98

The 420-430 Mhz is heavily used by Hams for aux. links, TV repeater inputs and outputs, experiments, etc. The 440-450 Mhz is also used for many voice repeater, simplex, and TV repeaters.

The LMCC seems to be asking for a very large number of frequencies. Sort of like the man that wanted 3 feet more of his neighbor's property so he claimed 6 feet of his neighbor's property. In court the judge compromised and gave the claimant the 3 feet he wanted in the first place.

Thank you,

A handwritten signature in cursive script, reading "Heru Ra Walmsley". The signature is written in black ink and is positioned below the "Thank you," text.

Heru Ra Walmsley W3WVV  
701 Wellham Avenue  
Ferndale, Maryland 21061

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Federal Communications Commission  
Secretary of the FCC, Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

May 19, 1998

RE: RM 9267

Dear Commission:

As a licensed Amateur Radio operator I want to go on record as being strongly against the petition under consideration, RM-9267. I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications.

The frequencies bands 420 MHz to 430 MHz and 440 MHz to 450 MHz, proposed for reallocation by this petition, are very important to our continued success in serving the public through our work. These frequency band segments include important linking, control, amateur television and repeater systems that are used daily by a large number of amateurs in Texas and other states.

The following is an example of just how important it is to maintain Amateur Radio access to these frequencies. Approximately one year ago, during a severe weather emergency in which several south Texas communities were completely cut off from communicating with the outside world, the San Antonio, Texas branch of the American Red Cross requested assistance from amateur radio groups in the area. One of those groups, Intertie, Inc., maintains a linked radio system which is connected from San Antonio west to California. Intertie, Inc. offered to let Red Cross personnel who were licensed amateur radio operators use the system to relay communications from the stricken areas in Uvalde County back to the San Antonio. Fortunately, there was no major damage or injuries to report, but the system worked flawlessly, and was the only link that the emergency workers had for communicating with the home office. The Intertie system uses the 420-430 MHz band for linking the remote sites, and it is clear that if other services such as Land Mobile were to have access to those bands, the Intertie system would not be able to perform its valuable emergency communications function.

I have been licensed for five years, and I personally use many different frequencies within these sub bands EVERY DAY. Amateur radio operators use these sub bands for all of the following: experimental communications; complex linking systems; remote control of transmitters and receivers operating on these and many other amateur bands; Public service exercises; and real emergency situations such as the one described above.

Amateur Radio has proven to be a successful secondary user to the government radiolocation operations on these frequency bands. RM-9267 contains no technical

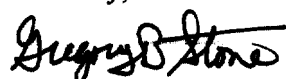
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solutions to prove that Amateur Radio users could continue to use these bands without serious interference if land mobile communications become the primary user.

Commission approval of any PMRS (or similar) allocation on this or any amateur frequency band will effectively terminate any Amateur Radio operations within the specified band. Amateur Radio operations in Texas which are a vital communications resource to the public during emergencies and disasters will be very badly damaged by the loss of 49 Percent of the available VHF amateur spectrum below 900 MHz.

I urge the Commission to DENY the above specified portions of RM-9267.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory B. Stone". The signature is fluid and cursive, with the first name "Gregory" being more prominent than the last name "Stone".

Gregory B. Stone, K5DRT  
229 Park Avenue  
Del Rio, Texas 78840

MAY 22, 1998

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern ino codei Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested isharingi this band with Amateur operations yet provides no explanation for how isharingi might occur. Based on the history of isharingi with commercial services (particularly the example of AVL companies isharingi 902-928 MHz who ordered hams off the air), isharingi means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services isharei with not-for-profit, community service oriented Amateur Radio operations. Amateur Radio has and will continue to share its VHF/UHF allocations with mutually compatible services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a mutual interest in sharing between compatible services like Amateur Radio and the U.S. government. However, there are no mutual interests in common with for-profit private land mobile services; isharingi, as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450 MHz band:

Calmont School  
Topanga, CA

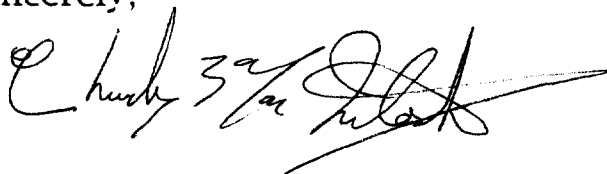
Disaster Responce Team of Topanga, CA

Disaster Responce Team of Agoura Hills, CA

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateurís ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radioís historic co-primary status in the entire band 420-450 MHz.

Sincerely,

A handwritten signature in black ink, appearing to read "Chuck MacIntosh", with a stylized flourish extending from the end.

Chuck MacIntosh KF6KFF  
8361 Quartz Av.  
Winnetka, CA 91306-1445

Brian W. Evans, P.E.  
6311 Chadwell Rd. SW  
Huntsville, Alabama 35802  
May 18, 1998

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RM 9267  
Secretary  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

Re: 420-450 Mhz Considerations for UHF Land Mobile Use/RM-9267:

In acknowledgment of requests for submittal of comments concerning RM-9267 required by June 1, 1998, the following statement is presented.

I respectfully request that any attempts to utilize the 420-450 Mhz(70cm wavelength) amateur radio frequency range for UHF Land Mobile use BE DISCONTINUED(for shared or other uses) and retain it solely for amateur radio(ham) use. I am referencing the Petition RM-9267. Intermodulation distortion on sensitive all-mode(AM/FM/Sideband/CW/RTTY)ham transceivers, "spurious" RF from adjacent UHF band-located Public Service frequencies in proximity, and 1/3 harmonic VHF pager/cellphone frequency transmission interference has already begun to degrade our ham bands and is currently present within our cities. We use the 440 band extensively everyday, not as a secondary mode, but for many 440 ham repeaters, remote bases, RF control/command signal transceiving, and crossband linking mobile and/or base radios. Especially useful are our 440 applications in the mountainous and hilly terrain, the enhancing with remote receiver-links to the 2 meter band repeater radios, used also in city-to-city networking for SKYWARN purposes, and making the Alabama InterCity Network(AICN)/crossbanding state ham network a possibility(used also by NWS/EMA in inclement/severe weather). A recent life saving implementation of the 440 Mhz radio link to NWS/Birmingham is used vigorously by our SKYWARN groups in realtime severe weather condition reporting. We certainly appreciate Mr. Brian Peters' efforts at the NWS and Birmingham liaison with ham operators all over the state of Alabama. This was instituted by hams in light of federal fund reductions and physical closing of the superb Huntsville NWS office(this contrary to technical rationale to retain local capability in "tornado alley"). Also of very special and notable mention was the nearly-emergency 'Mayday' use of the 430 Mhz ham equipment(for MIREX experiment/ham hobby use but serving as an aero-avionics equipment backup) on MIR during the crew module oxygen generator cartridge fire, as well as in Amateur radio satellites(AMSAT) exhibiting 420-450 Mhz for uplink/downlink communications. Above activities and privileges are admirable, and 420-450 Mhz communications are solely controlled and dutifully operated by regulated ham band operators, knowledgeable in communication protocol, and propagated as necessary to HF/other frequencies, via only ham(control op) liaison to other licensed and unlicensed personnel, and only identify a few uses of the 420-450 ham band. No other shared signal infringements should be allowed.

Additionally, I have and use both VHF and UHF Base/Land Mobile license privileges, and I believe enough allocation in bandwidth remains in those specific areas, especially with the currently available high-tech concepts, if implemented, for all to use more efficiently what already exists there via tone squelch, digital encoding/decoding, digital signal processing(DSP), etc.

Another great disadvantage of the RM proposal is from the standpoint of improper and offensive language trends I've already heard on Land Mobile, and any new multipurpose band-sharing allowance would lure the onset of this improper and detrimental activity. It would render ineffective our zero-tolerance for this as we could access only the ham callsign

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directory and not report all stations for penalties. The multi-shared band and contaminating attributes would be unacceptable, as extremely prolific and uncontrolled as is evidenced in CB, marine, and itinerant business band use.

Thank you very much for the privileges you provide to us as hams and for your consideration in disallowing frequency sharing.

Sincerely,



Brian W. Evans

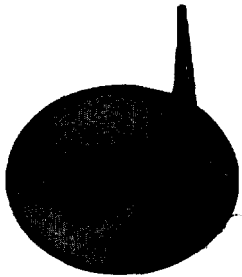
Ham callsign KE4OLR

- Shuttle/MIR/International Space Station ham communicator
  - North Alabama Skywarn
  - VHF/UHF Land Mobile and FM/HF Maritime operator
- Huntsville, Al. 35802

cc:

Brian Peters/Warning Coordination Meteorologist  
brian.peters@noaa.gov  
National Weather Service  
465 Weathervane Rd.  
Alabaster, Al. 35007-5079

The Honorable Bud Cramer  
budmail@mail.house.gov  
U.S. House of Representatives  
2416 Rayburn House Office Building  
Washington, DC 20515-0105



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# Coastal Electronics, Inc.

*Radio Communications - Cellular - Sales & Service*

4527 Hwy. 17 South  
P.O. Box 12007

New Bern, N.C.  
28561

919-637-3167  
800-682-4910  
Fax. (919) 637-5110

May 26, 1998

Ms. Magalie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, DC 20554

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Roman Salas:

Coastal Electronics, Inc. would like to offer our support of the Petition for Rulemaking filed by the LMCC seeking new spectrum for private wireless users. We are grateful that the FCC has agreed to place this petition on public notice.

Coastal Electronics is a sales and service company located on the eastern part of North Carolina. We service customers in 32 counties of our state. All of our service area is located in the hurricane zone. Therefore, our customers, as well as people in the area that are not at present using wireless devices, have a specific need for wireless devices to assist them in their business activity as well as providing communications to their employees during times of disaster.

Many potential and present users of wireless communications are being denied the opportunity to improve their Communications Networks because of the lack of frequencies available to them in all bands. We have had a loss of customer base as well as profit because of this void. We have nothing to offer some of these people. We feel that many customers have been restricted in their trade by this lack of frequencies and, therefore, perhaps have jeopardized the safety of their employees.

During natural disasters, such as hurricanes, PCS and cellular does not offer the coverage, reliability or immediate accessibility that the wireless communications industry can. There are many situations in our area that private business leaders have joined public safety agencies to assist in life saving through the use of the private radio systems as a

#### Coastal Electronics, Inc. Locations

313 Old Dairy Road  
Wilmington, N.C. 28405  
(910) 791-4646  
1-800-242-7507  
Fax. (910) 791-8937

1203 W. Grantham  
P.O. Box 1861  
Goldsboro, N.C. 27533  
(919) 734-8007  
1-800-670-0555  
Fax. (919) 734-2495

506 W. 13th Street  
P.O. Box 2667  
Greenville, N.C. 27834  
(919) 758-4264  
1-800-338-3591  
Fax. (919) 758-1969

GOOD SERVICE ALWAYS COSTS LESS!

We ask that the FCC address these issues quickly as we are experiencing more and more problems associated with the lack of spectrum. We can only think it will get more crowded and conditions will worsen.

Yours Very Truly,

A handwritten signature in cursive script, reading "Evelyn C. Haire".

Evelyn C. Haire  
President

ECH/ah

cc: Congressman Walter B. Jones, Jr.  
Congresswoman Eva Clayton  
Congressman Mike McIntyre  
Senator Jesse Helms  
Senator Lauch Faircloth

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**JON HEMPHILL FROST**

ATTORNEY AT LAW

3877 TWELFTH STREET  
RIVERSIDE, CA 92501

(909) 781-9290

May 26, 1998

**OFFICE OF THE SECRETARY,  
FEDERAL COMMUNICATIONS COMMISSION**  
1919 M STREET NORTH WEST, ROOM 222  
WASHINGTON, DISTRICT OF COLUMBIA 20554

**RE: OPPOSITION TO RM-9267 PETITION FILED BY THE LAND MOBILE  
COMMUNICATIONS COUNCIL**

Dear Secretary of the Federal Communications Commission:

This letter is to memorialize my opposition to the RM-9267 Petition filed by the Land Mobile Communications Council.

My opposition is based on the fact that this proposal would result in the loss of access to the 420-430/440-450 MHZ band segments. This would seriously affect the ability of our local Amateur Radio Association (RACES) to provide community public service during the times of disaster.

As you know, in the last several years, California has been plagued by one disaster after another, including severe fires, earth quakes, floods, mud slides, etcetera. Frequently, the only unaffected source of communications between the disaster preparedness agencies have been amateur radio communication, of which the 440 MHZ band has played a significant role.

Additionally, the amateur radio operators have utilized this frequency to experiment with advanced voice and packet systems which have greatly benefited the communications industry as a whole. The amateur radio operator's innovative and experimental nature has always resulted in advances in radio technology which have benefited the industry. Many of the innovations developed by amateur radio experimenters have benefited the military service as well. Both the size, range, and reliability of mobile military communications has been greatly enhanced by innovations discovered by amateur radio enthusiasts.

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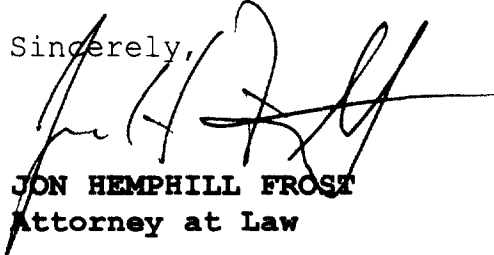
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May 26, 1998

Therefore, I consider that the loss of the 440 MHz band would affect myself and my fellow amateur operators more than the ability to pursue our hobbies. Actually, the loss of the 440 MHz would have a chilling effect upon the ability of amateurs to provide for communications in the advent of natural disasters, potential future military conflict, and the ability to experiment in these frequencies which as I pointed out, have always benefited the industry as a whole.

Thank you for your attention to this letter in opposition to the petition from the Land Mobile Communications Council (RM-9267).

Sincerely,



**JON HEMPHILL FROST**  
**Attorney at Law**

**Amateur License No. KC60KI**

JHF/vj  
cc: American Automobile Association

FM-29

Pennsylvania  
Philadelphia County

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# AA3NV

Del Val Omik  
National Omik

73,  
Darryl C. Russell, Sr.

RADIO ..... Confirming  
our QSO of ..... 19.....  
at ..... UTC on ..... MHz.  
Your ..... sigs RST .....  
Rig: .....  
Power: ..... Watts  
Ant: .....  
Rmks: *I oppose RM*  
*9267.*

☐ Pse

QSL

Tnx ☒

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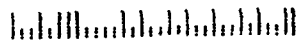


FEDERAL COMMUNICATIONS COMMISSION

AMATEUR RADIO STATION

*Secretary*  
*Federal Communications Comm.*  
*Washington, D.C. 20554*

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ABCDE



By Brownies

Office of the Secretary  
Federal Communications Commission, Room 222  
1919 M Street NW  
Washington, DC 20554.

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Dear Sirs:

MAY 28 1998

Recently I have learned that an organization has taken a position that is contrary to my interests.

FCC MAIL ROOM

On April 22, the Land Mobile Communications Council filed a petition (designated RM-9267) that seeks to reallocate the frequency bands 420-430 and 440-450 MHz for the use of the Private Mobile Radio Service. These bands are now heavily used by radio amateurs, operating in the Amateur Radio Service, for a variety of public service and public interest communications. The reallocation proposed by LMCC is incompatible with these operations.

As a licensed radio amateur I am dismayed by the LMCC proposal. I ask you to preserve the limited frequency spectrum that Amateur Radio enjoys.

Thank you for your attention on this important matter.

Sincerely,

David Fitchitt  
KB7VYF

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Subj: RM 9267

To: Federal Communications Commission Secretary

From: Patrick H. Nicholson, JR. N7WGR

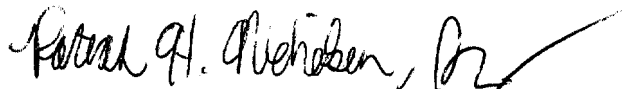
Dear Mr./Ms. Secretary,

In regards to RM 9267 I felt that I needed to express my concern over this topic. I have been an amateur for six years and have utilized the UHF band for all of that time. Every Hz. allocated to the UHF spectrum is very important to us amateurs. There are many repeater systems, including my own which I recently set up, that operate in the 440 band, so this could be a direct threat to me and my repeater system.

I am confident that the F.C.C. will consider this action very thoroughly, keeping in mind the implications of such an action. Ham radio is a very valuable asset to our country, especially in time of need and disaster. Hams communicate with each other over these bands for fun and urgency. Such a thing could discourage a lot of amateurs around the U.S. from renewing their tickets. My repeater is dedicated to emergency services and I haven't had a chance to utilize it in an emergency yet. Having millions of trained radio operators around the world is a great asset to our country in time of need!

Please don't take away our frequency allocations!

Sincerely,



Patrick H. Nicholson, Jr.  
N7WGR  
& A Concerned 440 MHz. Repeater Owner

May 20, 1998

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MAY 28 1998  
FCC MAIL ROOM

Federal Communications Commission  
Washington, D. C. 20554

**Re: RM-9267**

Dear Commission:

I am a licensed amateur radio operator and I am writing to express my strong **opposition** to **RM-9267**.

The 70-cm band is the second most useful and popular UHF/VHF allocation, with many FM repeaters, links and weak signal usage in the 420 to 450 MHZ range. RM-9267 would significantly impact this band.

As you know the amateur radio service is a secondary user of this spectrum, with the U.S. Government being the primary. This arrangement has worked well since the Government's usage of this spectrum (radar) results in minimal mutual interference.


However, RM-9267 would redesignate the land mobile service as the primary user. The types of signals they propose to use would, without question, be incompatible with amateur radio. Furthermore, the land mobile service provides no solutions for mitigating the mutual interference that would result. Clearly, amateur radio usage of the band would eventually be eliminated and our secondary user status would become meaningless.

As a member of Placentia R.A.C.E.S., I would like to remind you that during emergencies the amateur radio community provides significant radio facilities when normal lines of communication are out of service. With the 2 meter band so overloaded in urban areas, the 440 MHZ band becomes essential during emergencies and disasters to provide voice, packet and amateur TV traffic.

In addition, I use the 440 MHZ band on an almost daily basis and would miss the loss of this spectrum since there are not enough available frequencies to move to in the congested Southern California area.

I hope you will consider these points, and I urge you not to support or approve RM-9267.

Sincerely,



Robert D. Hecker  
KN6KJ

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# WESTERN INTERTIE NETWORK

2040 Hawley Drive, Vista, CA 92081  
Phone: 760/724-4020 Fax: 760/941-1601

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May 15, 1998

MAY 28 1998

FCC MAIL ROOM

Secretary  
Federal Communications Commission  
Washington DC, 20554

RE: RM 9267

Gentlemen,

It has come to our attention that the LMCC is demanding that you immediately reallocate most of the 420 to 450 MHz band presently in the amateur radio service. We strongly oppose any such action!

The 420 to 450 MHz amateur radio UHF band is the second most popular of the amateur radio services' VHF and UHF allocations. There are thousands of FM repeaters operating daily from 440 to 450 MHz, and a variety of modes on the air every day in the 420 to 430 MHz segment, including thousands of point to point links, and a very mature amateur television fraternity.

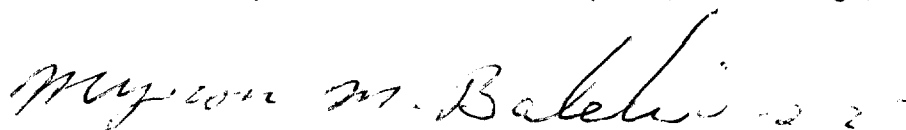
We at the Western Intertie Network (the WIN System) presently operate five high level UHF repeaters in the 440 to 450 MHz segment, covering from Southern Arizona to Central California, including all of the seven Counties of Southern California. We also operate ten point to point full duplex links.

Our group, the WIN System, has been affiliated with the San Diego County RACES emergency preparedness organization for years, and because of our wide area coverage, we have been able to handle innumerable pieces of emergency traffic during three major fires and two major earth quakes. It is impossible to estimate how many lives we have directly touched during emergencies, however, I am certain we have been a major communications force during these times of emergencies.

The WIN System also routinely operates many of our repeaters for public safety missions. Several times each year WIN System repeaters are used to handle communications at various Marathons, 10K runs, Bicycle Events, and Special Olympics Events for the handicapped. These public service communications activities would be impossible to achieve without the 440 MHz amateur band "wide area coverage" repeaters operated by the WIN System, and donated to public service.

We therefore strongly urge you to deny the demands of the LMCC. We as amateur radio operators continue to provide the above services free to the public. There is never a charge for either the 440 MHz repeater equipment, or the operators who donate their time and expertise during these times of public service. I do not think the LMCC would likewise provide such services free to the public. Their agenda is to make a profit from these frequencies, not to serve the public, free of charge, as is the amateur credo.

Sincerely,



Myron Balchin, WB6TUG  
P. O. Box 1396  
Ramona, CA 92065  
(760) 788-5992

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May 19, 1998

**Federal Communications Commission  
1919 M ST NW  
Washington, DC 20554**

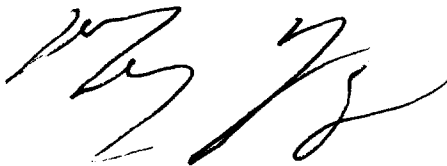
Dear FCC,

I am writing to you concerning RM-9267, the attempt to reallocate the 70cm Amateur Radio Band. As an active Amateur Radio Operator, I am very upset about the contents of this proposal.

First, I am sure you know of the significance Amateur Radio plays in communities all over the USA. We not only provide Public Service Communications, but most recently here in Gwinnett County, Georgia, we took an active role in the disaster relief efforts in conjunction with the Red Cross. Immediately following the Tornado, we used our 440 Repeater to handle early damage assessment reports. The 2 Meter Repeater was used as a control point for other communications. Had we not been able to use our 440 machine, the results would have been disastrous.

I hope that the interests of the Amateur Community, which are vital to public safety as well as providing enjoyment for licensed amateurs, will be considered as this proposal moves forward. Thank you for your past support of Amateur Radio, and your continued support in the future.

Sincerely,



**Barry Y. Zoll  
707 Bedrock Run  
Lawrenceville, GA 30043**

**N1TOQ**

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Office of the Secretary,  
Federal Communications Commission  
Room 222, 1919 M Street NW  
Washington, DC 20554.

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I am opposed to granting the Land Mobile Services access to the  
420-450 MHz band for the following  
reasons:

1. The Amateur usage of this band has expanded to the point that  
in heavier populated regions, such as the Pacific Northwest, there is no  
remaining spectrum space. Present usage of the band includes:

- a. Digital Networks and Backbones
- b. Amateur fast scan television, not allowed in lower frequency  
bands
- c. Satellite Uplinks and Downlinks (International)
- d. Narrow Band FM (NBFM) repeaters and simplex operations

2. The Land Mobile Services have not made efficient use of their  
presently assigned spectrum. For example, NBFM which was mandated in  
the late '50 is still being used. There are now more efficient narrow  
band modulation techniques available such as Companded AM which will  
give two to five times more channels density without loss of performance.

As the demand for spectrum increases, it is only logical that the FCC  
mandate more efficient utilization of available spectrum rather than to permit  
raiding what is already in use by other services.

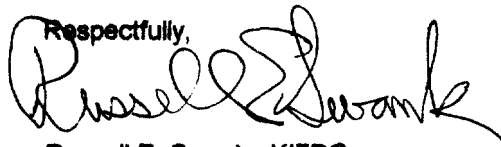
The advent of Cellular Telephone has taken pressure off of the Land  
Mobile Services because many users have found it more economical to use  
Cell Phones rather than invest in transceivers and repeater sites.

Because of this, I question their need for additional spectrum.

3. The Amateur frequency bands were never intended to be a pool  
of frequencies which could be raided at will by other services. The Hams  
have recently gone through the Little LEO satellite threat to  
the two meter band, threats from High Definition TV interests, etc. We  
even lost 40% of the 220 MHz Band to the United Parcel Service interests  
who only after getting their new frequency allocation, soon  
abandoned it.

Should this petition be granted over 100 repeaters now serving the  
Pacific Northwest would go silent thus jeopardizing the emergency  
services work which it and many others now serve.

I sincerely hope that the FCC in its wisdom will deny the request  
stated in RM 9267.

Respectfully,  


Russell E. Swank KI7PG

Russell E. Swank  
3259 N.W. Sunde Rd.  
Silverdale WA 98383

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Federal Communications Commission  
Washington D.C. 20554

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MAY 21 1998  
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May 21, 1998

Regarding - RM - 9267

Dear Commission Members:

I am writing to express my strong opposition to RM-9267.

I am a licensed amateur radio operator, and wish to point out that the 70 cm band is the second most popular VHF/UHF band allocated to our hobby. We have substantial repeater and other operations in the 440 to 450 MHZ (especially in urban areas), and there are various other uses in the 420 to 430 MHZ segment. RM-9267 would significantly impact the band.

The U.S. Government is the primary user on the 70 cm band and the amateur radio service is the secondary user. These two uses of the band have been compatible. RM-9267 would make the land mobile service the primary user and leave the amateur radio service as the secondary user. These two uses would be incompatible. Both would interfere with one another. Consequently the amateur radio service would have to withdraw from the band.

Many amateur radio operators are involved in public service. I am currently in charge of the City of Placentia, Calif. RACES group. Our experience has been that the 2 meter band and local repeaters are severely overloaded in times of emergency. Our group uses several local 440 MHZ repeaters for disaster communications. I believe that the loss of the band would hinder our disaster communications efforts.

I also use the 440 band almost exclusively for radio communications with friends, RACES group members, and auto-patch calls as needed.

I urge you to consider the incompatibility of the new proposed use with current usage as you discuss RM-9267.

Sincerely;

*Ron Chase AECMV*

Ron Chase

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May 20, 1998

Secretary FCC  
Washington, DC 20554

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Dear Sir:

I am completely and totally opposed to RM 9267  
and anything else that will harm HAM RADIO  
and the reduction or forfeiture of any of  
our bands, namely 70CM or 440 Ham Band.

Very truly yours,



William A. Blood KI7QZ  
624 Tuscarora Way  
Carson City, NV 89701

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